

REMARKS

Claims 1-6 and 21-22 are cancelled, without prejudice, as being directed towards a non-elected invention. Claims 7-11 and 17-20 are withdrawn. Claims 12 and 15 are amended. Claims 23-32 are new. No new subject matter is added.

Claim Objections

With this amendment, the spelling errors identified in claim 15 are corrected.

Claim Rejections - 35 USC § 102

Claims 12-16 are rejected under 35 U.S.C. 102(b) as being anticipated by U.S. Patent Application Publication No. 2001/0017418 to Noguchi, et al. ("Noguchi"). The applicant disagrees.

Claim 12 is amended to recite that the first and second lower interconnection lines extend a substantially equal distance past an end of the third lower interconnection line. This feature is fully supported by the original application at, e.g., FIG. 5B.

Noguchi's three middle lines 4 (FIGs. 4 and 5) do not show this feature. Consequently, Noguchi does not anticipate claim 12 because it does not show the identical invention in as complete detail as contained in the claim. MPEP 2131.

Claims 13-16 depend from claim 12, and inherently contain the features of claim 12. Consequently, Noguchi fails to anticipate claims 13-16 for at least the same reason as claim 12.

New Claims 23-32

Claims 23-27 are new, and share many of the same features as original claims 12-16, respectively. In addition, claim 23 recites that the upper interconnection lines are disposed parallel to the lower interconnection lines. This feature is fully supported by the original application at, e.g., FIG. 5B.

Noguchi's alleged upper interconnection lines 1 are not disposed parallel to the alleged lower interconnection lines 4 (FIGs. 4 and 5). Consequently, Noguchi does not anticipate claim 23 because it does not show the identical invention in as complete detail as contained in the claim. MPEP 2131.

Claims 24-27 depend from claim 23, and inherently contain the features of claim 23. Consequently, Noguchi fails to anticipate claims 24-27 for at least the same reasons as claim 23.

Furthermore, claim 24 recites that the third and fourth upper interconnection lines are bisected lengthwise by the same vertical plane and that ends of the third and fourth upper interconnection lines are separated from each other by a distance that is greater than a longest focus distance. Noguchi FIGs. 4 and 5 do not show this relationship between any of the alleged upper interconnection lines 1. For this additional reason, Noguchi fails to anticipate claim 24.

Claims 28-32 are new, and share many of the same features as original claims 12-16, respectively. In addition, claim 28 recites, *inter alia*, that the first lower interconnection line and the first upper interconnection line are aligned such that a first vertical plane running lengthwise to the first lower and upper interconnection line bisects both of them. This feature is fully supported by the original application at, e.g., FIG. 5B.

Noguchi's alleged upper interconnection lines 1 do not have the above relationship with the alleged lower interconnection lines 4 (FIGs. 4 and 5). Consequently, Noguchi does not anticipate claim 28 because it does not show the identical invention in as complete detail as contained in the claim. MPEP 2131.

Claims 28-32 depend from claim 27, and inherently contain the features of claim 27. Consequently, Noguchi fails to anticipate claims 28-32 for at least the same reasons as claim 27.

Furthermore, claim 28 recites that the fourth upper interconnection line is also bisected in a lengthwise direction by the third vertical plane and that ends of the third and fourth upper interconnection lines are separated from each other by a distance that is greater than a longest focus distance. Noguchi FIGs. 4 and 5 do not show this relationship between any of the alleged upper interconnection lines 1. For this additional reason, Noguchi fails to anticipate claim 28.

Conclusion

For the above reasons, reconsideration and allowance of claims 12-16 and 23-32 of the application is requested. Please telephone the undersigned at (503) 222-3613 if it appears that an interview would be helpful in advancing the case.

Respectfully submitted,

MARGER JOHNSON & McCOLLOM, P.C.


Todd J. Iverson
Reg. No. 53,057

MARGER JOHNSON & McCOLLOM, P.C.
210 SW Morrison Street, Suite 400
Portland, OR 97204
503-222-3613
Customer No. 20575

